

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

TEXAS A&M QUEER EMPOWERMENT
COUNCIL,

Plaintiff,

v.

WILLIAM “BILL” MAHOMES, ROBERT L.
ALBRITTON, DAVID C. BAGGETT, JOHN
W. BELLINGER, JAMES R. “RANDY”
BROOKS, JAY GRAHAM, MICHAEL A.
“MIKE” HERNANDEZ III, MICHAEL J.
PLANK, SAM TORN, and CAGE SAWYERS
in their official capacities as members of the
Board of Regents of the Texas A&M University
System;

JOHN SHARP, in his official capacity as
Chancellor of the Texas A&M University
System, and

MARK A. WELSH III, in his official capacity
as President of Texas A&M University,

Defendants.

CASE NO. 4:25-cv-992

RULE 65.1 CERTIFICATION

I, JT Morris, counsel for Plaintiff Texas A&M Queer Empowerment Council, certify that
I made the following efforts to give notice of Plaintiff’s motion for a temporary restraining order:

- Emailed copies of the Verified Complaint and Plaintiff’s Motion for a Temporary
Restraining Order and Preliminary Injunction to Zachary Berg, Special Counsel, Attorney
General for the State of Texas, at zachary.berg@oag.texas.gov.

- Plaintiffs are also making immediate efforts to personally serve each Defendant with process and a copy of Plaintiff's motion.

Dated: March 5, 2025

Respectfully submitted,

/s/ JT Morris

JT Morris (Tex. Bar No. 24094444, S.D. Tex.

Bar. No. 3163670)

FOUNDATION FOR INDIVIDUAL RIGHTS
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** Pro hac vice motion forthcoming*

Attorneys for Plaintiff

Texas A&M Queer Empowerment Council